

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

December 09, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

)

BY: Fidel Morales

DEPUTY

v.

)

Jose Luis Ramirez

)

Case No.

)

)

)

)

EP:24-M-04916-MAT*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 4, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

21 USC 841

Possession with intent to sell or distribute cocaine; at least 200 grams, but less than 300 grams.

This criminal complaint is based on these facts:

See Attachment

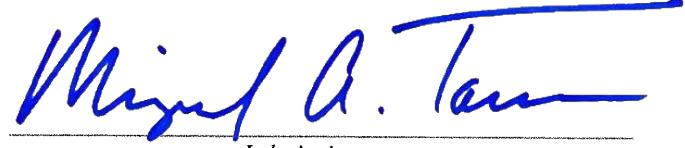
 Continued on the attached sheet.Complaint sworn to telephonically on
December 09, 2024 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**


Christopher Ramsay
Complainant's signature

Christopher Ramsay, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/09/2023


Miguel A. Torres

Judge's signature

City and state: El Paso, Texas

Miguel A. Torres, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

1. I, Christopher Ramsay, am a Special Agent with the Federal Bureau of Investigation (“FBI”), United States Department of Justice and conduct investigations of violations of Federal Criminal Law. I have been an FBI Special Agent since December 2020. I am assigned to the FBI El Paso Field Office, Organized Crime Drug Enforcement Task Force (OCDETF). During this time, I have investigated violations of numerous federal criminal statutes.

2. The information contained herein is based on my personal knowledge and observations made during the course of this investigation, information conveyed by other law enforcement personnel, from interviews and investigate activity, and the review of records and documents obtained during this investigation.

3. On December 4, 2024, a source of information informed Agents, a blue Jeep Wrangler, bearing New Mexico license plate (LP) number BYSP26 (JEEP), was involved in the trafficking of illegal narcotics in the FBI El Paso area of responsibility (AOR). At approximately 3:20 P.M., Agents identified the JEEP parked in the Cinemark Theater parking lot, located at 11855 Gateway Blvd West, El Paso, Texas 79936. Shortly thereafter, Agents observed an unidentified male in a red t-shirt and blue jeans interacting with the JEEP. Agents approached the unidentified male of the vehicle and obtained verbal consent to search the JEEP. The unidentified male identified himself as Jose Luis Ramirez (RAMIREZ). Following the verbal consent, Border Patrol Agent Adrian Perez assisted with K9 Edo (Serial # 230216) who conducted an open-air sniff of the JEEP. The K9 alerted to the properties of narcotics in rear of the vehicle. Subsequent to a physical search of the JEEP, a clear bag with a white powdery substance was found within a brown bag, located in a factory storage compartment in the rear of the JEEP. The white powdery substance field tested positive for the properties of cocaine. The clear bag with the white powdery substance weighted approximately 266.4 grams.

4. FBI Agents then interviewed RAMIREZ. RAMIREZ was advised of his rights to which RAMIREZ stated that he understood his rights and agreed to answer questions without an attorney present.

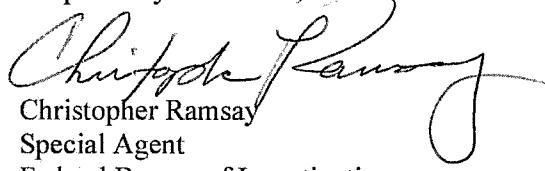
RAMIREZ admitted to knowing he had the cocaine bundle, approximately 10 ounces, in the JEEP. RAMIREZ admitted to Agents he was delivering the cocaine to an unidentified buyer, and he was going to receive \$8,000 from the buyer in exchange for the delivery. RAMIREZ represented he was directed to deliver the narcotics by his “jefe” or boss, “El Moreno”. In addition, RAMIREZ admitted he has traveled to Wichita, Kansas three times to pick up drug sale proceeds. RAMIREZ indicated he transported the illegal proceeds back to El Paso and provided to El Moreno.

5. Agents contacted the United States Attorney’s Office who accepted prosecution. RAMIREZ was transported to the El Paso County Jail for booking.

6. This affidavit does not set forth all known facts regarding the investigation but only those facts which establish probable cause.

7. Based upon the facts set forth in this affidavit, there is probably cause to believe that JOSE LUIS RAMIREZ committed a violation of Title 21, U.S.C. 841 – Possession with intent to distribute more than 200, but less than 300 grams of cocaine.

Respectfully Submitted,


Christopher Ramsay
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before met on _____, 2024

Miguel A. Torres, United States Magistrate Judge